

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

KAREN BACKUES KEIL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 5:18-CV-06074-BP
	)	
EDWARD BEARDEN, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES  
IN CASES CONSOLIDATED FOR TRIAL AND POST-TRIAL MATTERS**

Come now Plaintiffs, Karen Keil, Lynnsey Betz, Ashley Zieser, and Trenady George, and for their Motion for Attorney Fees and Expenses, state as follows:

1. Four cases were consolidated for trial under this cause number. All four cases were civil rights lawsuits brought under 42 U.S.C. §1983. The Court has now consolidated the four cases for all post-trial motions. [Doc. 205].
2. Plaintiffs are prevailing parties as the jury awarded them significant damages. [Doc. 199].
3. Plaintiffs now seek their reasonable attorney fees and expenses as allowed by 42 U.S.C. §1988.
4. Plaintiffs are simultaneously filing their Suggestions in Support of this Motion, and attached to those Suggestions are their time records and other supporting material for their fees and expenses.
5. Plaintiffs are seeking a total of \$405,622.50 in attorney fees, and \$5,014.52 in expenses, as set forth in Exhibit 1 to the Suggestions.

WHEREFORE, Plaintiffs pray for an Order of the Court awarding them \$405,622.50 in attorney fees, and \$5,014.52 in expenses, and for such other and further relief as may be appropriate.

Respectfully submitted,

/s/ John J. Ammann

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Plaintiffs' Motion for Attorneys' Fees and Expenses has been served upon counsel of record by means of the Court's electronic filing system this 12<sup>th</sup> day of May, 2022.

/s/ John J. Ammann

John J. Ammann